

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

**AMY DIVINE; KARL MERCHANT; and
COLUMBUS JONES, on behalf of themselves
and all others similarly situated,**

PLAINTIFFS

v.

CIVIL ACTION NO.: 1:23cv196 HSO-BWR

SECURIX, LLC

DEFENDANT

DECLARATION OF BRITTANEY A. THORNTON

I, Brittaney A. Thornton, declare as follows:

1. I am a paralegal at the law firm of Chhabra Gibbs & Herrington PLLC.
2. On September 4, 2024, I called the City of Ocean Springs, Mississippi Municipal Court Clerk's office and asked if Plaintiff Amy Divine's "ticket" had been docketed with the municipal court. The clerk's staff member stated that neither Divine's name nor citation number had been docketed. Further, the clerk's staff member stated that the citation number "did not sound like one of our tickets."
3. On September 4, 2024, I called the Ocean Springs Municipal Court Clerk's office and asked if Plaintiff Karl Merchant's "ticket" had been docketed with the municipal court. The clerk's staff member advised me that neither Merchant's name nor citation number had been docketed.
4. On September 4, 2024, I called the Senatobia Municipal Court Clerk's office and asked if Plaintiff Columbus Jones' "ticket" had been docketed with the municipal court. The clerk's staff member advised me to call the number on the "ticket" because Securix is a "completely separate entity" and none of Securix's "tickets" were docketed.

I declare under penalty of perjury that the foregoing is true and correct. Executed in

Madison, Mississippi on September 4, 2024.

/s/ Brittany A. Thornton

Brittaney A. Thornton (Paralegal)
Chhabra Gibbs & Herrington PLLC
a Mass Tort & Class Action Firm
120 N Congress St. Suite 200

The Plaza Building

Jackson, MS 39201

T: (601) 326-0874

F: (601) 948-8010

E: bthornton@nationalclasslawyers.com